

# Exhibit C

**From:** [Victor Careaga](#)  
**To:** [Robert Kuntz](#)  
**Cc:** [Angelica Mecias](#)  
**Subject:** [EXTERNAL] Re: Clarification regarding production of documents at your deposition on Tuesday, March 7, 2023.  
**Date:** Friday, March 3, 2023 8:43:27 AM

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**This Message originated outside your organization.**

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Good morning, Mr. Kuntz,

I received your email sent by you yesterday.

Victor Careaga

On Thu, Mar 2, 2023 at 5:58 PM Robert Kuntz <[rkuntz@riveromestre.com](mailto:rkuntz@riveromestre.com)> wrote:

Mr. Careaga:

With respect to the documents requested in the subpoena duces tecum for your deposition on Tuesday, March 7, 2023, we have received papers from plaintiff's counsel in the Missouri litigation taking the position that those requests contravene Judge Sippel's January 26, 2023 Memorandum and Order in the Missouri litigation. They are wrong about that and Doe Run and Renco will respond to counsel's filings in due course. We have not received any such objections from you, but although you are not represented by those lawyers (a fact they confirmed this week), you are employed by them, so we anticipate you may wish to take the same ill-advised position.

For the avoidance of doubt, let us be clear: **We do *not* seek from you discovery specific to any plaintiff whose claim is currently pending in the Missouri litigation (the only limitation that Judge Sippel placed on discovery in the Florida matters).**

Excluding such current-plaintiff-specific documents does not, of course, relieve you of your obligations under the subpoena. Your activities in Peru have been wide-ranging, and the methods and practices that you and others used to recruit would-be "plaintiffs" and to collect or create documents and records have been employed for years. So they likely apply in many cases to current plaintiffs and to dismissed plaintiffs in the Missouri litigation.

Accordingly, you must search for and produce responsive documents even if such documents are *theoretically relevant* to represented plaintiffs—because, for example, the same person recruited plaintiffs whose claims are pending and plaintiffs whose claims have been dismissed, or because a document

references recruitment practices generally and mentions no individual plaintiff.

Producing such documents is required under the subpoena, while being fully consistent with Judge Sippel's order.

We do, of course, seek documents that are specific to any *dismissed* plaintiffs. And where a document is otherwise responsive but references individuals whose claims are now pending in the Missouri litigation, you should redact all personally identifying information and produce the document.

Please contact us if you have any questions. We look forward to seeing you Tuesday and to your production of all responsive documents.

Please kindly reply to acknowledge your receipt of this correspondence.

## RIVERO MESTRE

### Robert Kuntz

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